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July 21, 2020

VIA ECF

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The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
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Re: United States v. Hernan Lopez, et al.
Criminal Docket No. 15-252 (S-3) (PKC)

Dear Judge Chen:

We represent the defendant, Full Play Group S.A. (“FPG”), in the above-referenced matter. On July 6, 2020, Defendants Hernan Lopez and Carlos Martinez filed a Motion for Severance and to Strike Certain Language in the Indictment (Dkt. No. 1408) (the “Severance Motion”). This matter now being before Your Honor, Defendant FPG intends to join in this request by way of response to the Severance Motion. Pursuant to Your Honor’s Individual Practices and Rules, and in the interest of judicial efficiency, we respectfully submit this letter to propose to the Court a revised briefing schedule for the Severance Motion and FPG’s joinder.

The present briefing schedule allows for response papers to be filed by July 22, 2020 and replies due no later than August 5, 2020. The Court also scheduled oral argument, if any, and a status conference for August 19, 2020. Upon conferring with the government on July 19, 2020, and recognizing that it would be more efficient for a consolidated schedule, the parties have agreed upon the following proposed revised schedule:

- Defendant FPG’s response joining the Severance Motion due no later than July 24, 2020;
- Government’s response due no later than August 12, 2020; and
- Defendants’ replies, if any, due no later than August 26, 2020.
- Oral argument and/or status conference the week of August 31, 2020 or at the Court’s convenience.

Counsel for Lopez and Martinez, who on July 20, 2020 were conferred with, have no objection to this proposed revision.

Accordingly, Defendant FPG respectfully requests that the Court grant the proposed revised briefing schedule. We thank the Court for its consideration of this request and we remain at the Court’s disposal should Your Honor have any questions or concerns.

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Respectfully,

/s/ Carlos F. Ortiz

Carlos F. Ortiz

CFO:MCB:KF/ck

cc: Counsel of record (via ECF)
Clerk of Court (PKC) (via ECF)